

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WINONA JACKSON )  
on behalf of plaintiff and a class, )  
                      )  
                     Plaintiff, ) 08 C 762  
                      ) Judge Guzman  
v.                   ) Magistrate Judge Mason  
                      )  
                     )  
MRC RECEIVABLES CORPORATION; )  
MIDLAND CREDIT MANAGEMENT, INC.; and )  
ENCORE CAPITAL GROUP, INC., )  
                      )  
                     Defendants. )

**NOTICE OF MOTION**

**TO:** (See attached service list.)

**PLEASE TAKE NOTICE** that on Thursday, February 21, 2008 at 9:30 a.m., we will appear before the Honorable Judge Ronald A. Guzman in Room 1219 of the United States District Court, for the Northern District of Illinois, 219 S Dearborn St, Chicago, IL 60604, and present the following: **PLAINTIFF'S PRELIMINARY MOTION FOR CLASS CERTIFICATION.**

s/ Daniel A. Edelman  
Daniel A. Edelman

Daniel A. Edelman  
Cathleen M. Combs  
James O. Lattner  
Cassandra P. Miller  
EDELMAN, COMBS, LATTNER & GOODWIN, LLC  
120 S. LaSalle Street, 18th Floor  
Chicago, Illinois 60603  
(312) 739-4200  
(312) 419-0379 (FAX)

**CERTIFICATE OF SERVICE**

I, Daniel A. Edelman, hereby certify that on February 12, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and caused the foregoing to be served on the following parties via Certified Mail:

MRC RECEIVABLES CORPORATION  
Corporation Service Company  
2711 Centerville Road  
Suite 400  
Wilmington, DE 19808

MIDLAND CREDIT MANAGEMENT, INC.  
Illinois Corporation Service Co.  
801 Adlai Stevenson Drive  
Springfield, IL 62703

ENCORE CAPITAL GROUP, INC.  
8875 Aero Drive  
Suite 200  
San Diego, CA 92123

s/ Daniel A. Edelman  
Daniel A. Edelman